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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

ROLON MORRIS,

Plaintiff,

v.

CLARK PACIFIC, a California General  
Partnership; and DOES 1 – 20, inclusive,

Defendants.

Case No. 2:20-cv-01291-WBS-CKD

**CORRECTED STIPULATION TO  
CONTINUE TRIAL AND PRETRIAL  
DEADLINES; ORDER**

Pursuant to Civil Local Rule 143, Plaintiff Rolon Morris (“Plaintiff”) and Defendant Clark Pacific (“Defendant”) (collectively the “Parties”), by and through their respective counsel, hereby submit this Stipulation to Continue Trial and Pretrial Deadlines.

Recitals

1. Plaintiff filed this action on June 29, 2020 (Dkt. 1), and filed a first amended complaint (operative complaint) on August 31, 2020 (Dkt. 11).

2. Defendant filed an answer to the first amended complaint on November 19, 2020. (Dkt. No. 23)

3. Initial disclosures were made on January 15, 2021. Thereafter, the parties participated in written discovery. No depositions have been taken.

4. On January 5, 2022, the Court approved the consensual substitution of counsel for Plaintiff. (Dkt. No. 33)

5. Trial in this matter is set for August 23, 2022. (See Dkt. No. 25)

6. The current pretrial schedule in this matter is as follows:

a. January 14, 2022: Expert disclosures and reports due

b. February 9, 2022: Rebuttal expert disclosures and reports due

c. March 16, 2022: Fact discovery cutoff

d. April 6, 2022: Motion deadline

e. June 20, 2022: Pretrial conference. (Dkt. No. 25)

7. The parties previously requested a 90-day continuance of fact and expert discovery, which the Court granted. (Dkt. No. 28) This is the first request for a trial continuance in this matter.

8. Good cause supports the requested continuance of the trial, pretrial conference, and pretrial deadlines. Plaintiff recently retained new counsel, who require time to review the case file, to familiarize themselves with the factual and legal issues in the case, and to prepare and conduct discovery. Additionally, Plaintiff’s counsel is scheduled to be in trial in Alameda County Superior Court the week of August 22, 2022. The parties jointly require time to investigate and conduct discovery so they may fully analyze the case, explore resolution, and

1 prepare for trial. The parties agree that prejudice will result if a continuance is not granted, and  
2 that the length of the requested continuance is reasonable under the circumstances.

3 Stipulation

4 The Parties, by and through their respective counsel, therefore stipulate and agree, and  
5 respectfully request that the Court issue an order continuing the trial to February 21, 2023, and  
6 continuing the pretrial conference to December 19, 2022, and the discovery and motion  
7 deadlines as follows:

- 8 a. September 16, 2022: Fact discovery cutoff; pretrial motion filing deadline  
9 b. October 3, 2022: Expert disclosures and reports due  
10 c. November 1, 2022: Rebuttal expert disclosures and reports due  
11 d. November 23, 2022: Expert discovery cutoff.

12 **IT IS SO STIPULATED.**

13  
14 Dated: January 18, 2022

CALIFORNIA CIVIL RIGHTS LAW GROUP

15  
16 By: /s/ Julianne Stanford  
17 Julianne Stanford  
18 Attorney for Plaintiff  
19 ROLON MORRIS

20 Dated: January 18, 2022

COOK BROWN, LLP

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22 By: /s/ Terry Wills  
23 Terry Wills  
24 Attorney for Defendant  
25 CLARK PACIFIC  
26 *As authorized on 1/18/22*  
27  
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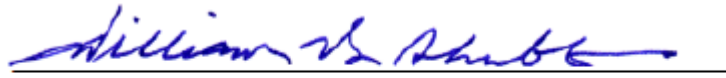
**ORDER**

Based upon the foregoing Stipulation and for good cause appearing thereon, the Court orders as follows:

1. Jury Trial in this matter is continued to **February 22, 2023 at 9:00 a.m.;**
2. The pretrial conference is continued to **December 19, 2022 at 1:30 p.m.;** and
3. The pretrial deadlines are continued as follows:
  - a. September 16, 2022: Fact discovery cutoff; pretrial motion filing deadline
  - b. October 3, 2022: Expert disclosures and reports due
  - c. November 1, 2022: Rebuttal expert disclosures and reports due
  - d. November 23, 2022: Expert discovery cutoff.

**IT IS SO ORDERED.**

Dated: January 27, 2022

  
**WILLIAM B. SHUBB**  
**UNITED STATES DISTRICT JUDGE**